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July 25, 2014

Via Electronic Filing

Hon. Christian F. Hummel
U.S. Magistrate Judge
James T. Foley, U.S. Courthouse
445 Broadway
Albany, New York 12207

Re: Ranieri v. Adirondack Development Group, LLC, et a.
Case No.: 1:11-CV-01013-GTS-DRH
Our File No.: PL7142

Dear Justice Hummel:

I am writing to respectfully request a conference to discuss an expert witness substitution. On July 23, 2014, we met with plaintiff's construction expert Corey Lewandowski to prepare for his noticed deposition scheduled for Monday, July 28, 2014. At that time, Mr. Lewandowski advised that he could no longer serve as our expert due to family and business issues.

Since Wednesday, we have been able to retain a new construction expert who is of the same opinion as Mr. Lewandowski. Plaintiff seeks to serve an amended expert disclosure substituting Mr. Lewandowski for a new expert, but with no change to the content of the expert opinion.

Please advise if the Court is willing to schedule a conference to discuss this matter and entertain plaintiff's request.

Thank you for your cooperation and assistance in this matter.

Respectfully yours,

THORN GERSHON TYMANN
AND BONANNI, LLP


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